

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

No. 17-cv-05806-RJB

**JOINT MOTION FOR ENTRY OF
PROPOSED STIPULATED
PROTECTIVE ORDER**

JOINT MOTION FOR ENTRY OF PROPOSED STIPULATED PROTECTIVE ORDER

The parties, by and through their respective counsel, and in compliance with Local Rule 7 of the U.S. District Court for the Western District of Washington, submit the following Joint Motion for Entry of Proposed Stipulated Protective Order.

This is an action brought by the State of Washington challenging The GEO Group, Inc.’s (“GEO”) practices regarding detainee labor at the Northwest Detention Center (“NWDC”). The parties anticipate this case may require the production of confidential nonpublic personal, personnel, employment, financial and/or tax records, medical, or other information implicating privacy, proprietary, security, or safety interests of either the Plaintiff, the Defendant or a third party.

Rule 26(c) provides for the entry of “any order which justice requires to protect a party or person from annoyance, embarrassment, oppression or undue burden or expense.” Pursuant to LCR

1 26(c), the parties' proposed stipulated protective order seeks to protect confidential, proprietary, or
2 private information. The protective order does not "purport to confer blanket protection on all
3 disclosures or responses to discovery . . . and it does not presumptively entitle the parties to file
4 confidential information under seal." LCR 26(c)(2).

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6 Furthermore, the protective order "extends only to the limited information or items that are
7 entitled to confidential treatment." *Id.* The parties have identified eleven distinct categories of
8 information for protection. Categories one, two, four, five, and six seek to protect an individual's
9 medical information, financial information, immigration information or immigration status, non-
10 public criminal history, and personally identifying or locating information. Category three seeks
11 to protect certain business financial information. Categories seven through twelve seek to protect
12 safety and security-related information. Categories three and seven through twelve seek to protect
13 certain sensitive and proprietary staffing information.
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15 The parties have stipulated to and request entry by the Court of the Proposed Protective
16 Order Concerning Confidential Information attached hereto. In accordance with LCR 26(c), a
17 redline version of the Proposed Protective Order identifying departures from the Model Protective
18 Order is attached.

19 WHEREFORE, the parties respectfully request that the Court enter the attached Proposed
20 Stipulated Protective Order.
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Respectfully submitted this 20th day of June, 2018.

BOB FERGUSON
Attorney General of Washington

NORTON ROSE FULBRIGHT US LLP

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THE GEO GROUP, INC.**

CERTIFICATE OF SERVICE

I, Susana Medeiros, hereby certify as follows:

I am over the age of 18, a resident of New York County, and not a party to the above action. On June 20, 2018, I electronically served the above Joint Motion for Entry of Stipulated Protective Order via Email to the following:

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1 I certify under penalty of perjury under the laws of the State of Washington that the above
2 information is true and correct.

3 DATED this 20th day of June, 2018 at New York, New York.

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7 Susana Medeiros
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